

**UNITED STATES DISTRICT COURT
DISTRICT OF [EASTERN] MASSACHUSETTS
CIVIL ACTION NUMBER: 04-CV-12316-WGY**

**KEVIN P. LOUGHMAN,
A Citizen of the Commonwealth of Massachusetts,
Plaintiff**

vs.

**MAURA MAHONEY,
Now Believed to Be a Citizen of the State of Florida
In Her Former Capacity as Security Services Manager,
Lotus Development Corporation**

and

**LOTUS DEVELOPMENT CORPORATION,
Based in Cambridge, Massachusetts,
Formerly a Wholly-Owned Subsidiary of
INTERNATIONAL BUSINESS MACHINES CORPORATION, (IBM),
Believed to Be Based and Incorporated, in the State of New York,**

Defendants

**PLAINTIFF'S MOTION FOR AUTHORIZATION FOR A ONE-WEEK
EXTENSION OF TIME PERIOD FOR FILING ANSWER TO
DEFENDANT'S MOTION TO DISMISS**

By and For the Plaintiff, Pro-Se

Kevin P. Loughman

4 Marrigan Street, Arlington, Massachusetts, 02474

Telephone: 781-641-2756

I, Kevin P. Loughman, Plaintiff Pro-Se in the above-captioned federal civil complaint, do hereby motion this Honorable Court for a seven-day extension of the time period allowed for response to “Defendant’s Motion to Dismiss,” which motion was simultaneously mailed to the Plaintiff and also filed with the Court on September 7th, 2005.

As reason for making this request, Plaintiff states to this Court that he was out of the country from Wednesday, September 7th until Wednesday, September 14th, 2005, and, hence, not in a position to receive this document, until Wednesday, September 14th.

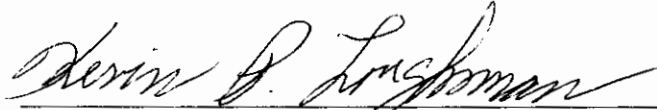
Documentation of his absence, at “Exhibit A” consists of a one-page xerographic reproduction of the stamped notation in Plaintiff’s U. S. Passport, originally made by the Irish Immigration Service at Shannon Airport in the Republic of Ireland on the morning of September 8th, 2005; as well as a notation on the same Passport Page of Plaintiff’s return to the U.S. on September 14, 2005, made by the U.S. Customs and Border Protection Agency at its Field Operation in Shannon, Ireland. For extra measure, a reproduction of Plaintiff’s Boarding Pass/Seat Assignment is also enclosed.

As of this date, September 19th, 2005, the Plaintiff has already completed about 2/3 of his response to Defendant’s Motion to Dismiss,

and expects to complete, proof-read, and double-check legal citations within the next few days, allowing for transmission to the Court, within the period of a seven-day extension, based upon his receipt of the Motion to Dismiss on September 14th, 2005.

Respectfully submitted to this Court

(Signed under the pains and penalties of perjury)

A handwritten signature in cursive script, reading "Kevin P. Loughman".

Kevin P. Loughman, Plaintiff, Pro-Se, September 19, 2005

CERTIFICATE OF SERVICE

I, Kevin P. Loughman, Plaintiff in this instant case, hereby certify that on the above date, I served the above document by mailing a copy of same, postage pre-paid, to Attorney David Bliss Wilson, Co-Counsel for the Defendants, at the Law Firm of Robinson & Cole, L.L.P., One Boston Place, Boston, MA 02108-4404.

A handwritten signature in cursive script, reading "Kevin P. Loughman".

Kevin P. Loughman, Plaintiff, Pro-Se, September 19, 2005